

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MELISSA ARZU, Individually and as the
Administrator of the Estate of KEVIN ISMAEL
GREENIDGE, Deceased and MELISSA ARZU
Individually,

Plaintiffs,

-against-

AMERICAN AIRLINES, INC.,

Defendant.

Case No. 1:23-cv-02116

NOTICE OF MOTION

Motion By:

MELISSA ARZU, Individually and as the Administrator of
the Estate of KEVIN ISMAEL GREENIDGE, Deceased and
MELISSA ARZU Individually, Plaintiffs

Place of Hearing:

This motion is returnable in the United States District Court,
Southern District of New York, 500 Pearl Street, Courtroom
11C, New York, NY 10007, before the Honorable Magistrate
Judge Stewart D. Aaron.

Supporting Papers:

Memorandum of Law of Jeremy A. Hellman, Declaration of
Jeremy A. Hellman with accompanying exhibits,
Declaration of Melissa Arzu.

Relief Demanded:

An order pursuant to Federal Rules of Civil Procedure
§15(2) permitting plaintiffs to amend their complaint to add
specific jurisdiction as a basis for personal jurisdiction
in this matter as well as Long Arm jurisdiction under CPLR
§302(a)(1)(2)(3) and due process.

Dated: July 28, 2023
New York, NY

RHEINGOLD GIUFFRA RUFFO & PLOTKIN LLP
Attorneys for Plaintiffs

/s/ Jeremy A. Hellman

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I certify that a true copy of the above document was served upon each attorney of record by ECF on July 28, 2023

/s/ Jeremy A. Hellman